

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

| | | |
|-----------------------------|---|----------------------------|
| MELISSA M. CALDWELL | : | CHAPTER 13 |
| Debtor(s) | : | |
| | : | |
| vs. | : | |
| | : | |
| JACK N. ZAHAROPOULOS | : | |
| STANDING CHAPTER 13 TRUSTEE | : | |
| Respondent | : | CASE NO: 1:22-bk-01455-HWV |

TRUSTEE'S OBJECTION TO DEBTOR'S MOTION
TO INCUR DEBT PURSUANT TO 11 U.S.C. §364

AND NOW, this 31st day of January, 2023, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney, Douglas R. Roeder, and files this Objection to Motion to Incur Debt Pursuant to 11 U.S.C. §364, based on the following:

1. Debtor alleges in Paragraph 8 of her Motion that the monthly payment on the vehicle she wishes to purchase is \$400.00.
2. Debtor currently lists no installment payment for a vehicle on her schedule J.
3. Based on Debtor's Schedules I and J as filed, Debtor's monthly net income is currently \$709.96.
4. Debtor's proposed plan payment under the current plan, which is not confirmed, is \$710.00 per month and will increase to \$2,317.85 per month in September of 2023.
5. An increase in the Debtor's monthly expenses of \$400.00 per month would decrease the Debtor's monthly net income to a point where even the current plan payments are no longer feasible.

WHEREFORE, Trustee requests this Honorable Court to deny Debtor's Motion.

Respectfully submitted,

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717)566-6097

BY: /s/Douglas R. Roeder
Attorney for Trustee
droeder@pamd13trustee.com

CERTIFICATE OF SERVICE

AND NOW, this 31st day of January, 2023, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

E. Haley Rohrbaugh, Esquire
135 North George Street
York, PA 17401

/s/Deborah A. Behney
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee